

MEMORANDUM

CH2M HILL

PREPARED FOR: Sylvia Burges/EPA Region 10

DATE: June 10, 1996

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TECHNICAL STATUS REPORT



PREPARED FOR: Sylvia Burges/EPA Region 10
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PREPARED BY: Liz Luecker/CH2M HILL
DATE: June 10, 1996
SUBJECT: Rhône-Poulenc Monthly Status Report
SITE NAME AND LOCATION: Rhône-Poulenc Inc./Seattle Plant
Tukwila, WA
REPORTING PERIOD: May 1 through May 31, 1996
PROJECT: 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task P1-Project Management

The EPA status report was faxed to EPA on May 10 and mailed the same day.

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

On May 8, Northwest Container asphalted part of the South Road (e.g., where sinkholes had developed last summer) and a 10-foot strip adjacent to the North Road near the facility entrance.

Task A3-Interim Measures

Report.

A report documenting the compressor pad excavation, the PCB ditch excavation, sewer cleaning, and disposal of associated waste streams is currently being developed by Terra Nova Environmental Sciences and CH2M HILL.

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LNAPL.

RP monitored the wells for LNAPL on May 31. The wells monitored for LNAPL were: H10, MW-12, H11, DM-7, H9, G3, B6, MW-14, MW-15, MW-17, MW-18, MW-19, and MW-20. Well B6 was not accessible at this time because a container belonging to Northwest Container was stored on top of it. No well monitored contained a measurable amount of LNAPL. The sample from well H10 had a film. The sample from well H11 had a sheen, while the sample from MW-12 had oily globules. The remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

Task A8-Round 3 Technical Memorandum

On May 21, RP sent a letter to EPA responding to each of EPA's comments on the Round 3 Technical Memorandum.

Task S1-Miscellaneous Support

Sewer Wash Water in Rain-for-Rent Tank.

The last of the water from cleaning the non-PCB contaminated tanks was filtered during May. RP decanted the water off of the 5 drums of sludge from cleaning the non-PCB-contaminated wash water tanks and the partial drum of sludge and rinsate from the April 10 cleaning of the last Rain-For-Rent tank. This decant and the 4 drums of rinsate from the April 10 cleaning of the last Rain-for-Rent tank were transferred to the mobile holding tank; the water was recirculated through one-micron filters. The water was sampled and the sample sent to Sound Analytical on May 15. Results received on May 20 indicated that the sample contained 0.24 mg/l copper. This water (approximately 400 gallons) was discharged to Metro on May 31.

Task S3-Laboratories

Due to problems with the existing laboratory, CH2M HILL is in the process of re-procuring analytical services. The bid package was sent to IEA, ARI, S-Cubed, Quanterra, and QAL. RP is evaluating the laboratories.

RP has chosen IEA Laboratories (a CLP and Washington State-certified laboratory) to perform the majority of future analyses. The intertidal sediment samples that need to be analyzed using Puget Sound Estuary Program (PSEP) protocols will be analyzed by Maxwell S-Cubed Laboratory; IEA has not had any experience with these protocols.

Deliverables Submitted

The April Progress Report was submitted to U.S. EPA on May 10, 1996.

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RP submitted a letter to U.S. EPA on May 21, 1996 responding to agency comments on the Round 3 Technical Memorandum.

Progress Planned For Next Reporting Period

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

The PCB ditch area will be paved by Lakeridge Paving once excavation of contaminated soils is complete and EPA approves the Interim Measures report.

The soil and shrubbery Northwest Container Services' contractor removed from the area near the Facility's North Road, near the entrance (in RFI investigation Areas BG and A3) and from south of the laboratory building (in Area 3) is still being stockpiled on site. The soil was placed in two dirt piles (approximately 10 cubic yards) located at the northwest corner of the laboratory building and a third pile located southwest of the laboratory building (approximately 100 cubic yards). These soils are classified as non-hazardous based on past sampling data.

Storm Water.

Sediments in the bottom of the 800,000 gallon open-top tank will be cleaned out and may be managed with the non-PCB-contaminated wash water sediments. This cleaning may be held off until the rainy season is over so that solidification of the sediments before landfilling can be minimized.

Task A3-Interim Measures

LNAPL.

Continue to monitor LNAPL thicknesses in selected monitoring wells monthly.

Task A8-Round 3 Data Technical Memorandum

A meeting or conference call with EPA and Ecology regarding the Round 3 Tech Memo may be necessary to reach agreement on the number of sediment samples.

Task S1-Miscellaneous Field Support

Drum Disposal.

A total of 28 drums of wastes are on site. The wastes include:

- 12 drums of sludge from cleaning the PCB-contaminated wash water tanks,

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- 8 drums of rinsate from cleaning the PCB-contaminated wash water tanks,
- 5 drums of sludge from cleaning the non-PCB-contaminated wash water tanks,
- 2 drums of used activated carbon
- 1 and 1/2 drums of filters

The PCB-contaminated rinsate and standing water in the PCB-contaminated sludge drums will be filtered through one-micron filters and discharged to Metro, if the water meets Metro's discharge limits.

The various sludges will be solidified and landfilled at the Waste Management, Inc., hazardous waste facility in Arlington, OR. Testing has shown that the sludges contain less than 50 ppm PCBs.

The activated carbon drums will be sent to the Rollins/Aptus facility in Aragonite, UT for incineration.

API Separator Clean Out.

The water layer in the API Separator will be pumped off, filtered, and discharged to Metro. CEcon will clean the separator, and the combined upper emulsion and lower sludge layers will be solidified for landfilling at the Waste Management, Inc., hazardous waste facility in Arlington, OR.

Outfall 4 Wash Water in Aluminum Tank.

Approximately 1,000 gallons of outfall 4 wash water and sludge are in the aluminum tank. The water in the aluminum tank will be filtered on site through one-micron filters and discharged to Metro, if possible. Sludge in the tank will be removed, solidified, and landfilled at the Waste Management, Inc., hazardous waste facility in Arlington, OR.

rhône-p/MSR/05-96EPA

RHONE POULENC - MARGINAL WAY FACILITY MONTHLY LNAPL SURVEY LOG Floating Product Layer Thickness in Feet																																									
Date Sampled	H10	H1	MW12	H11	DM7	H9	H6	DM2A	DM2B	DM8	A9	DM3A	DM3B	A2	A4	DM4	B4	B2	DM5	B1A	B1B	C1	DM6	B5	G3	G1	B6	MW13	MW14	MW15	MW16	MW17	MW18	MW19	MW20	DM1A	DM1B	E3			
6/7/94	0		0																																						
6/8/94	0		0																																						
6/17/94	Film	0	0.007	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0														
8/4/94	Film	Sheen	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0														
9/8/94	Film	0	Film	0.01	0	Sheen	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.021	0.005	0	0	0.01	0						
10/6/94	0	0	Sheen	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.021	0						
11/3/94	0	0	0.005	0.005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0	0	0	0	0				
12/5/94	0	0	0	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
1/11/95	0.26 ^a	Sheen	Sheen	0.04 ^d	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.01 ^a	0	0	0	0	0	0	0	0	0		
2/17/95	2.01	0	0.16	Sheen	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0 ^b	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
3/23/95	0.01										0	0	0	0	0 ^c					0	0	0														0	0	Sheen ^e			
3/27/95		0	Sheen	0	0	0	0	0	0	0						0	0	0	0				0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
3/28/95								—																0																	
4/27/95	0.063	0	Film ^d	0		0				0	0	0	0	NA	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0			0	0.063 ^c	Sheen	0					
4/28/95					0		0	0	0							0														0	0										
5/31/95	0.01	0	Film	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
6/30/95	Sheen ^d	0	Film	NA	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	Sheen	Sheen	0	0	0	0	0	0	0	0		
7/28/95																	0			0			0	0				0	0									0			
7/29/95	Sheen	0	Sheen	NA	0	0	0	0	0	0	0	0	0	NA	0	NA		0	0		NA					0	0	0			0	0	0	0	0	0	0	0	0		
8/26/95	Sheen	0	Sheen	0	0	0	0	0	0	0	0	0	0	NA	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
9/29/95	0.03	0			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
10/4/95			Sheen ^d	^d													0											0													
10/30/95	0.03	0	^d	Film	0	0						0	0	0	0	0	0	NA	NA		0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0 ^f	
10/31/95							0	Sheen	Sheen	0	0							NA	NA	0						NA															
11/30/95	Film	0	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
12/31/95	0.2	0	Film	Sheen	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
1/3/96	1.17		^d	Sheen	0	0																				0		NA		0	0		0	0	0	0	0	0	0	0	
2/27/96	Film ^g		0	Sheen	0	0																				0		0		0	0		0 ^h	0.09	0	0 ⁱ					
3/31/96	Film		Film	Film	0	0																				0		NA		0	0	0	0	0	0	0	0	0	0	0	
4/29/96	Film		^d	Sheen	0	0																				0		NA		0	0		0	0	0	0	0	0	0	0	
5/31/96	Film		^d	Sheen ^h	0	0																				0		NA		0	0		0	0	0	0	0	0	0	0	
^a Solinst Model 121 oil/water interface probe. After 1/11/95, all wells were monitored using this probe when significant LNAPL is present. ^b No sheen noted when measurement device was placed in clean water, but water turned light brown after probing. ^c Orange/rust colored residue on probe. ^d Globules. ^e Dark Phase. ^f Odor of decay. ^g 1000 mL of LNAPL were bailed from H10 at 10:45 am ^h Slight sheen NA = Not accessible.																																									